

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
WESTERN DIVISION

LAMISS INVESTMENTS, LLC;
MITCH RICHARD; DONALD ALLEN;
HARRIET ALLEN HENRY; STEVEN
CAMPO; AND LONNIE SHANNON
MELTON

PLAINTIFFS

v.

CIVIL ACTION NO. 5:24-cv-00111-DCB-BWR

JEFFREY KELLER; KYLE W. FELLING;
TIMOTHY THOMPSON; BRIAN NEARN;
BRICO, INC.; AND PROBYSCI, LLC

DEFENDANT

**PLAINTIFFS' RESPONSE IN OPPOSITION TO
DEFENDANTS' MOTION TO COMPEL ALTERNATIVE
DISPUTE RESOLUTION AND STAY JUDICIAL PROCEEDINGS**

COME NOW, LAMISS Investments, LLC, Mitch Richard, Donald Allen, Harriet Allen Henry, Steven Campo, and Lonnie Shannon Melton ("Plaintiffs"), through counsel, and present their Response in Opposition to the Motion to Compel Alternative Dispute Resolution and Stay Judicial Proceedings filed by Defendants Jeffrey Keller, Timothy Thompson, Brian Nearn, Brico, Inc., and Probysci, LLC, as follows:

1. In support of their Response in Opposition to Defendants' Motion to Compel Alternative Dispute Resolution and Stay Judicial Proceedings, Plaintiffs incorporate by reference the legal authorities and arguments set forth within their Memorandum Supporting their Response in Opposition to the Motion to Compel Alternative Dispute Resolution and Stay Judicial Proceedings.

WHEREFORE, Plaintiffs respectfully pray that this Court deny in full Defendants' Motion to Compel Alternative Dispute Resolution and Stay Judicial Proceedings. Plaintiffs respectfully request any further relief the Court deems appropriate.

This, the 10th day of January, 2025.

Respectfully submitted,

LAMISS INVESTMENTS, LLC; MITCH RICHARD;
DONALD ALLEN; HARRIET ALLEN HENRY;
STEVEN CAMPO; AND LONNIE SHANNON
MELTON

/s/ Michael A. Heilman
Michael A. Heilman

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification to all counsel of record.

This, the 10th day of January, 2025.

/s/ Michael A. Heilman
Michael A. Heilman